

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG PA

SEP 05 2000

Ian Mordle
Petitioner

No. 1 CV-00-1163

MARY E. D'ANDREA, CLE
Per SJK

v.

(Judge Kane)
(Magistrate Judge Durkin)

I.N.S.
Respondent

MOTION FOR EXTENTION OF TIME TO REPLY TO THE RESPONSE
TO THE ORDER TO SHOW CAUSE

COMES NOW, the Petitioner Ian Mordle, Pro Se, and respectfully requests for an extention of time to reply to the INS's response to the order to show cause which is due by September , 2000.

This extention is necessary in order to prepare an effective & meaningful rebuttal, since he is proceeding on a Pro Se basis and avers in support of his claim thereof:

1) The time set for the submission of his reply is too short to get the Job done. Most of the cases cited by the INS are not available for the Petitioner and he needs to get them from an outside source.

2) Petitioner's access to the law library is limited each week and is not sufficient for meaningful research. Petitioner needs more time to prepare a good defense within the specified time.

Petitioner believes the " INS" will not be prejudiced in

granting him this extention, since their response has already been submitted.

Wherefore, Petitioner prays that this Honorable court grants him the extention in order to facilitate his reply submission which is critical to his defense.

August 25, 2000.

Respectfully Submitted,

Ian Mordle

Ian Mordle
York County Prison
3400 Concord Road
York Pa. 17402.

CERTIFICATE OF SERVICE

CASE NAME: IAN MORDLE V. INS.

CASE NO : NO. 1:CV-00-1163

I HEREBY CERTIFY, that on this 25 day of SEPTEMBER, 2000.
I caused to be served the :

XX by placing a true copy thereon in a sealed envelope, with postage thereon fully prepaid and causing the same to be mailed by first class mail to the address set forth below.

 by causing to be personally delivered a true copy thereon to the person at the address set forth below.

 by FEDERAL EXPRESS: AIRBORNE EXPRESS to the person at the address set forth below.

 by CERTIFIED MAIL - return receipt requested to the person at the address set forth below.

 by telefaxing with acknowledgement of receipt to the person at the address set forth below.

ADDRESS OF THE PERSON BEING SERVED:

THEODORE B. SMITH
ASSISTANT U.S. ATTORNEY
228 WALNUT STREET SUITE 220
P.O. BOX 11754
HARRISBURG, PA. 17108-1754

I declare under penalty of perjury that the foregoing is true and correct.

Ian Mordle
Signature